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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

THOMAS BARBOSA, DECEASED, by )  
and through his Co-Successors in Interest, )  
LUPITA BARBOSA, Individually, and as )  
mother and Next Friend for K.B. and T.B., )  
minors; ANGELICA MARTINEZ-VERA, )  
individually; and KATHLEEN HOOD, )  
individually, )

Plaintiffs,

vs. )

SHASTA COUNTY, a public entity; )  
SHASTA COUNTY SHERIFF- )  
CORONER ERIC MAGRINI, in his )  
individual capacity; SHASTA COUNTY )  
SHERIFF'S SERGEANT JOSE )  
GONZALEZ, in his individual capacity; )  
SHASTA COUNTY SHERIFF'S )  
DEPUTY THOMAS FLEMING, in his )  
individual capacity; and DOES 3 through )  
20, individually, jointly and severally, )

Defendants. )

No: 2:20-cv-02298-JAM-DMC

**STIPULATION AND ORDER TO  
MODIFY BRIEFING SCHEDULE RE:  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

All parties, by and through their counsel of record, stipulate and hereby move this court to modify the briefing schedule for Plaintiffs' Opposition and Defendants' Reply re: Defendants' Motion for Summary Judgment, as follows:

Event	Current Date/Deadline	Proposed Date/Deadline
Plaintiffs' MSJ Opposition	August 5, 2022	August 19, 2022
Defendants' MSJ Reply	August 12, 2022	August 26, 2022
MSJ Hearing	September 13, 2022	UNCHANGED

Good cause exists to grant the requested modification:

1. This is a civil rights/wrongful death case involving the shooting death of Thomas Barbosa against Defendants Shasta County, Shasta County Sheriff-Coroner Eric Magrini, Shasta County Sheriff's Sergeant Jose Gonzalez, and Shasta County Sheriff's Deputy Thomas Fleming.
2. Plaintiffs' counsel's office has several filing and discovery deadlines over the next two weeks in multiple cases, including pretrial filings due in a case before this Court: *Johnson v. City of Redding, et al.*, 2:19-cv-01722-JAM-DB. Additionally, Plaintiffs' counsel's office has had three employees out with COVID-19 (each case unrelated to the others) over the past few weeks, including an associate who was out all of last week and part of the previous week – further impacting the office's workload over the next two weeks. The Parties believe that this stipulation to moderately extend the MSJ briefing schedule by two weeks, without changing the hearing date, is reasonable to accommodate these scheduling and staffing complications.

For the foregoing reasons, the Parties respectfully request that this Court enter an order modifying the briefing schedule for Plaintiffs' Opposition to Defendants' MSJ, and Defendants' Reply, as set forth above.

1  
2 IT IS SO STIPULATED

3 DATED: July 26, 2022

HADDAD & SHERWIN LLP

4  
5 /s/ Brian Hawkinson

6 BRIAN HAWKINSON

Attorneys for Plaintiffs

7  
8 DATED: July 26, 2022

MANNING & KASS

ELLROD, RAMIREZ, TRESTER LLP

9  
10 /s/ Kayleigh A. Andersen

11 Kayleigh A. Andersen

Attorneys for Defendants

**ORDER**

Based on the parties' stipulation, and with good cause appearing therefor,

IT IS HEREBY ORDERED that the briefing schedule responsive to Defendants' Motion for Summary Judgment be modified as follows:

Event	Deadline
Plaintiffs' MSJ Opposition	August 19, 2022
Defendants' MSJ Reply	August 26, 2022

IT IS SO ORDERED.

DATED: July 26, 2022

/s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE